

# UNITED STATES DISTRICT COURT

for the  
Central District of California

In the Matter of the Search of	)	
Two United States Postal Service Priority Mail	)	
Parcels bearing tracking numbers	)	Case No. 8: 24-MJ-00034
9505 5147 9296 4016 1211 13 and	)	
9405 5361 0553 6189 3283 73.	)	
	)	
	)	
	)	

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

*See Attachment A*

located in the Central District of California, there is now concealed (*identify the person or describe the property to be seized*):

*See Attachment B*

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	Distribution and Possession with Intent to Distribute a Controlled Substance
21 U.S.C. § 843(b)	Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance

The application is based on these facts:

*See attached Affidavit*

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (*give exact ending date if more than 30 days: \_\_\_\_\_*) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: \_\_\_\_\_

City and state: Santa Ana, CA

AUSA: Rosalind Wang 714-338-3547

/s/ Zachary Sumpter

*Applicant's signature*

Zachary Sumpter, Task Force Officer (USPIS)

*Printed name and title*

*Judge's signature*

Hon. Autumn D. Spaeth, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, Zachary Sumpter, being duly sworn, declare and state as follows:

**I. TRAINING AND EXPERIENCE**

1. I am a Task Force Officer ("TFO") with the United States Postal Inspection Service ("USPIS") and have been so since November 2021. I am currently assigned as a TFO to the Contraband Interdiction and Investigations South Team of the Los Angeles Division, which is responsible for investigating drug trafficking involving the United States Mail. Accordingly, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7). Specifically, I am an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. Prior to being assigned as a TFO with the USPIS, I worked patrol as a full-time sworn law enforcement officer with the Chino Police Department. I have been a sworn law enforcement officer since August 2013. I am a Police Officer within the meaning of California Penal Code § 830.1.

2. I have received training and have experience investigating violations of state and federal narcotics and money laundering laws. I have been involved in various electronic surveillance methods including state and federal wiretap investigations, the debriefing of informants and witnesses, as well as others who have knowledge of the manufacturing, distribution, transportation, storage, and

importation of controlled substances, and the laundering of drug proceeds. I have participated in many aspects of drug investigations, including investigations into the smuggling of illegal drugs, money laundering, and extortion related to drug trafficking. I am familiar with narcotics traffickers' methods of operation, including the manufacturing, storage, transportation, and distribution of narcotics, the collection of money that represents the proceeds of narcotics trafficking, and money laundering. I am familiar with how drug traffickers use counter-surveillance techniques to avoid detection by law enforcement.

## **II. PURPOSE OF AFFIDAVIT**

3. This affidavit is made in support of a search warrant for the SUBJECT PARCELS described below and in Attachment A, for the items listed in Attachment B. The items to be seized constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance).

4. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. The affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation

into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

### **III. PARCELS TO BE SEARCHED**

5. This affidavit is made in support of an application for a search warrant for the following two United States Postal Service ("USPS") Priority Mail parcels (hereinafter referred to as the "SUBJECT PARCELS"), which are currently secured at the USPIS Task Force Office located at the Chino Police Station, 5450 Guardian Way, Chino, California:

a. SUBJECT PARCEL 1 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5147 9296 4016 1211 13. SUBJECT PARCEL 1 is a brown, large-sized cardboard box addressed to "Michael Hammock, 11901 Santa Monica, Blvd Los Angeles C.a., 90025." The return address listed on SUBJECT PARCEL 1 is "David Piano, 3050 Meadowwood rd NW, Massillon OH 44646." SUBJECT PARCEL 1 was postmarked on January 16, 2024, in the 44662 ZIP code.

b. SUBJECT PARCEL 2 is a United States Postal Service Priority Mail parcel bearing tracking number 9405 5361 0553 6189 3283 73. SUBJECT PARCEL 2 is a white, medium-sized USPS Flat Rate box addressed to "Cameron H, 1105 S Euclid St, Unit D P O Box 370, Fullerton, CA 92832." The return address listed on SUBJECT PARCEL 2 is "Shawn Brennan, 17 Aimees Way, Fitchburg MA 01420." SUBJECT PARCEL 2 was postmarked on January 22, 2024, in the 01420 ZIP code.

#### **IV. ITEMS TO BE SEIZED**

6. The items to be seized from the SUBJECT PARCELS constitute fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mail) to Facilitate the Distribution of a Controlled Substance). The items to be seized are identified in Attachment B, which is incorporated herein by reference.

#### **V. STATEMENT OF PROBABLE CAUSE**

##### **A. Background**

7. As described in detail below, the SUBJECT PARCELS are inbound parcels to the greater Orange County and Los Angeles area from different regions of the United States and were selected for investigation because they met certain criteria common to packages containing contraband. The SUBJECT PARCELS are believed to contain controlled substances or the proceeds from the trafficking of controlled substances based on, among other things, positive alerts by a trained narcotics-detection canine.

8. Based on my training and discussions with experienced Postal Inspectors, I know that Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In particular, they began conducting organized interdictions of Express Mail and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances

in Los Angeles, California, in the early 1990s. Along with conducting organized interdictions, Postal Inspectors also regularly examine and investigate Express Mail and Priority Mail parcels throughout the year. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances using boxes, with the proceeds in the form of cash. Although Postal Inspectors still see the use of boxes for controlled substances and cash, there has been a gradual change over the years toward the current trend of smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances that lend a sense of legitimacy to the parcel.

9. From my training, personal experience, and the collective experiences related to me by Postal Inspectors on my team who specialize in investigations relating to the mailing of controlled substances and drug proceeds, I am aware that the greater Los Angeles area is a major source area for controlled substances. As such, controlled substances are frequently transported from the greater Los Angeles area via the United States Mail, and the proceeds from the sale of the controlled substances are frequently returned to the greater Los Angeles area via the United States Mail. These proceeds are generally in large amounts of money over \$1,000.

10. I also know, based on my training and experience, that drug traffickers will often use one of two USPS services -- Priority Mail Express Service, which is the overnight/next day delivery mail service, and Priority Mail Service, which is the two-to-three-day delivery mail service. Drug traffickers use Priority Mail Express delivery services because of their speed, reliability, and the ability to track the package's progress to the intended delivery point. Drug traffickers often use Priority Mail delivery services because they allow drug traffickers more time for travel between states if they are following their shipments to their destinations for distribution. Like Priority Mail Express, Priority Mail also allows drug traffickers to track the package's progress to the intended delivery point.

11. Based on information derived and built upon over many years, I, like other Postal Inspectors and Task Force Officers, initially look for certain characteristics when examining Priority Mail Express and Priority Mail for controlled substances or drug proceeds. These characteristics include:

- a. The article is contained in a box, flat cardboard mailer, or Tyvek envelope;
- b. The article bears a handwritten label; and/or
- c. The handwritten label on the article does not contain a business account number.

12. Parcels found to meet these characteristics are scrutinized by Postal Inspectors and Task Force Officers through further investigation, which may include return and addressee

address verifications and trained narcotics-detecting canine examination. Postal Inspectors and Task Force Officers will also look for additional drug or drug proceed parcel characteristics such as:

- a. The seams of the article are taped or glued shut;
- b. The article emits the odor of a cleaning agent, adhesive, or spray foam, detectable by a human; and/or
- c. Multiple articles are mailed to the same individual, on the same day, from different locations.

13. Based on my training and experiences and information learned during discussions with Postal Inspectors, I know that drug traffickers often use fictitious or incomplete names and/or addresses in an effort to conceal their identity from law enforcement. Indeed, it is my experience that when real addresses are used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

**B. Investigation of the SUBJECT PARCELS**

14. Between January 19 and 23, 2024, during routine parcel inspections at the City of Industry USPS Processing and Distribution Center, the SUBJECT PARCELS were identified as meeting some of the initial suspicious characteristics described above.

15. Upon inspecting the SUBJECT PARCELS, I observed that the parcels were each consistent with the size, shape, and appearance of parcels previously identified in other investigations that contained controlled substances or drug proceeds. Furthermore, SUBJECT PARCEL 1 was mailed from a

postal facility inconsistent with the zip code listed for the sender. Based on my training and experience, I know that drug traffickers will often mail parcels from postal facilities other than those located in their respective ZIP codes to attempt to distance themselves from the parcel.

16. After being identified, each SUBJECT PARCEL was removed from the mail stream and additional investigation was conducted.

**C. Investigation of SUBJECT PARCELS Using Accurint Database Checks**

17. On January 25, 2024, I examined the SUBJECT PARCELS and learned the following:

a. SUBJECT PARCEL 1 is wrapped in copious amounts of masking tape around its seams, has a handwritten label in ink, and does not have a business account number, which, based on my training and experience, is common in parcels used by narcotic traffickers. According to Accurint<sup>1</sup> database records, the return address information listed on SUBJECT PARCEL 1 is associated with the listed sender, "David Piano." Per Accurint, the listed recipient, "Michael Hammock," is not associated with the listed recipient address on SUBJECT PARCEL 1.

b. SUBJECT PARCEL 2 has a USPS Priority Mail label that does not have business account number. According to Accurint database records, the return address information listed on SUBJECT PARCEL 2 is associated with the listed sender "Shawn

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<sup>1</sup> ACCURINT is a public information database used by law enforcement that collects personal identifying information like names, addresses, and telephone numbers.

Brennan.” Based on an Accurint database check, the listed recipient, “Cameron H,” is not associated with the listed recipient address on SUBJECT PARCEL 2.

**D. Positive Canine Alert on the SUBJECT PARCELS**

18. On January 25, 2024, Riverside Police Department Detective David Bee and his certified narcotics-detection canine, “Kilo,” conducted an exterior examination of each of the SUBJECT PARCELS. The exterior examinations were conducted separately. Detective Bee informed me that Kilo gave a positive alert to each of SUBJECT PARCELS 1 and 2, indicating the presence of controlled substances or other items that emitted the odor of controlled substances, in the SUBJECT PARCELS. Attached hereto as Exhibit 1, which I incorporate fully herein by reference, is a document setting forth information provided by Detective Bee regarding Kilo’s training and history in detecting controlled substances, and examination of SUBJECT PARCELS 1 and 2.

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**VI. CONCLUSION**

19. Based on the above, I believe there is probable cause to believe that the items listed in Attachment B, which constitute evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance) will be found in the SUBJECT PARCELS, as described in Attachment A.

Attested to by the applicant in  
accordance with the requirements  
of Fed. R. Crim. P. 4.1 by  
telephone on this \_\_\_\_ day of  
January 2024.

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HONORABLE AUTUMN D. SPAETH  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

**PARCELS TO BE SEARCHED**

The SUBJECT PARCELS are currently secured at the USPIS Task Force Office located at the Chino Police Station, 5450 Guardian Way, Chino, California, and are as follows:

a. SUBJECT PARCEL 1 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5147 9296 4016 1211 13. SUBJECT PARCEL 1 is a brown, large-sized cardboard box addressed to "Michael Hammock, 11901 Santa Monica, Blvd Los Angeles C.a., 90025." The return address listed on SUBJECT PARCEL 1 is "David Piano, 3050 Meadowwood rd NW, Massillon OH 44646." SUBJECT PARCEL 1 was postmarked on January 16, 2024, in the 44662 ZIP code.

b. SUBJECT PARCEL 2 is a United States Postal Service Priority Mail parcel bearing tracking number 9405 5361 0553 6189 3283 73. SUBJECT PARCEL 2 is a white, medium-sized USPS Flat Rate box addressed to "Cameron H, 1105 S Euclid St, Unit D P O Box 370, Fullerton, CA 92832." The return address listed on SUBJECT PARCEL 2 is "Shawn Brennan, 17 Aimees Way, Fitchburg MA 01420." SUBJECT PARCEL 2 was postmarked on January 22, 2024, in the 01420 ZIP code.

**ATTACHMENT B**

**ITEMS TO BE SEIZED**

1. The following are the items to be seized from SUBJECT PARCELS 1 and SUBJECT PARCEL 2, which constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance):

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Any associated packaging.

**DECLARATION**

I, Detective David Bee, being duly sworn, declare and state:

I am a sworn peace officer within the meaning of California Penal Code § 830.1.

**TRAINING AND EXPERIENCE:**

I have been a peace officer for the Riverside Police Department for 16 years. At the beginning of my career with the Riverside Police Department, I attended a six-month police academy. After completing the academy, I was assigned to the patrol division, where I conducted directed patrol and responded to emergency calls for service for 11 years. During this time, I conducted numerous investigations involving subjects that possessed, used, sold, and transported illegal drugs. I observed, arrested, and talked to thousands of subjects while handling or assisting with these investigations.

In August 2019, I was promoted to the rank of Detective and assigned to our Narcotics Unit, where I currently work. I frequently investigate crimes related to illicit drug sales, transportation, trafficking, manufacturing, and other associated drug violations. I have attended schools related to these investigations, including a two-week ICI Narcotics Investigations Course, a two-week ICI Core Course for Investigators, and a course in Street Crimes and Drug Abuse Recognition. In April 2021, I attended a one-week Clandestine Laboratory Certification Course. During these trainings, I received instruction and hands-on experience with how illicit drugs are manufactured, packaged, transported, sold, and ingested. On multiple occasions, I have purchased illicit drugs in an undercover capacity and routinely work with confidential informants during the course of my duties. I frequently interview subjects involved in the drug trade to stay current on the latest trends and have testified as a drug expert in Riverside Superior Court.

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**NARCOTICS K9 TEAM DETECTIVE BEE AND K9 KILO'S TRAINING AND CERTIFICATIONS:**

In December 2022, I attended a five-week K9 handler's course taught by Man K9 Inc. in San Diego, California. At the conclusion of the course, K9 Kilo and I were certified as a drug detection K9 team through Man K9 Inc. and Peace Officer Standards and Training ("P.O.S.T."). K9 Kilo is trained to detect odors of the following controlled substances: methamphetamine, cocaine, heroin, and fentanyl. Certifications typically are conducted bi-annually, and K9 Kilo's most recent certification took place on October 18, 2023. In addition to bi-annual certifications, K9 Kilo's reliability and proficiency are tested on a weekly basis by Man K9 Inc. in a controlled environment. All certifications and most proficiency assessments are conducted "single blind" (where the result is unknown to the handler). Single blind certification and proficiency assessments ensure that the handler cannot "cue" the dog, as the handler does not know the result. All of K9 Kilo's certifications and training are conducted using real contraband that has been tested and confirmed as such. K9 Kilo and I train on average 20 hours a month in the area of narcotics detection and frequently use circulated and uncirculated United States Currency as a distraction odor.

On January 25, 2024, Task Force Officer (TFO) Zack Sumpter working with the United States Postal Inspection Service requested narcotics detection K9 Kilo's assistance in a narcotics parcel investigation. At approximately 2:10 p.m. the same day, I responded to the parking lot of Hobby Lobby located at 200 Hidden Valley Pkwy Suite #B Norco, CA 92860. K9 Kilo conducted a sniff of the parcel(s) described below and gave a final positive alert for the presence of an odor he is trained to detect (methamphetamine, heroin, cocaine, and fentanyl).

K9 Kilo alerted to the odor of narcotics emitting from the parcel listed below.

#1 USPS Priority Mail parcel bearing tracking label number: 9505 5147 9296 4016 1211 13

Sender: "David Piano  
3050 Meadowwood rd NW  
Masillon OH 44646"

Recipient: "Michael Hammock  
11901 Santa Monica Blvd  
Los Angeles C.a. 90025"

#2 USPS Priority Mail parcel bearing tracking label number: 9405 5361 0553 6189 3283 73

Sender: "SHAWN BRENNAN  
17 AIMEES WAY  
FITCHBURG MA 01420

Recipient: "CAMERON H  
1105 S EUCLID ST  
UNIT D PO BOX 370  
FULLERTON CA 92832



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Detective David Bee

Riverside Police Department